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January 2, 2024

Via E-Mail

Stanley W. Hammer, Assistant Attorney General
R. Cooper Vaughan, Assistant Attorney General
Office of the Attorney General
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Re: Logan-Patterson v. Wyatt, Case No.: 3:24-cv-526

Dear Stanley:

I address below the issues raised in your December 19, 2024 letter.

Page 1 of Your letter

Document Request 17. Plaintiff has no non-privileged, responsive documents.

Document Request 22. Plaintiff has no non-privileged, responsive (relating to the Incident) documents. He did communicate with friends or family that day, but the messages do not concern the Incident.

Document Requests 21. and 23. Plaintiff has no additional non-privileged, responsive documents (relating to the Incident) other than Mr. Shabazz's communications.

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Document Request 33. Plaintiff would be open to a third party reviewing his phone for only matters occurring on December 11, 2024. Plaintiff's representative would be present during the review. As to footnote 3, Plaintiff did not save the post in question to his archive; as such, it is not accessible.

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Document Requests 18 and 19. Please see my response above to Document Request 33.

Interrogatory 1. The interrogatory unreasonably requested, among other things, the identity of children attendees at the party. In any event, the overly broad interrogatory was fully answered by Plaintiff.

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Interrogatories 5 and 6. Discovery has only just commenced. Plaintiff has only recently received written reports from the troopers on scene. No depositions have been taken. Further, numerous potential tests that could have been used to show that Ontario was not involved in the car chase seem to be incomplete. The description of such in the Complaint is full and detailed based on the information Plaintiff currently has. After discovery is completed, indeed after it has been commenced and Plaintiff has learned more about what information Defendant Wyatt had at time he commenced the detainment of Plaintiff, Plaintiff will be in a better position to add to his statements in the Complaint concerning malice and material misrepresentations and omissions.

Please feel free to contact me if you have any additional questions or concerns.

Best regards,

A handwritten signature in blue ink, appearing to read 'Mark J. Krudys', with a stylized, flowing script.

Mark J. Krudys